COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Piedmont Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

DuPont Teijin Films™ - Mylar® Plant
5401 Jefferson Davis Highway; Chesterfield County, Virginia
Permit No. PRO-51924

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, DuPont Teijin Films™ has applied for a renewal Title V Operating Permit for its film coating facility. The Department has reviewed the application and has prepared a draft renewal Title V Operating Permit.

Permit Contact:_____ Date: _____
Erica D. Sveum
(804) 527-5097

Air Permit Manager:_____ Date: _____
James E. Kyle, P.E.

Deputy Regional Director:_____ Date: _____
Kyle Ivar Winter, P.E.

FACILITY INFORMATION

Permittee
DuPont Teijin Films™ U.S. Limited Partnership
P.O. Box 27222
Richmond, Virginia 23261

Facility
DuPont Teijin Films™
5401 Jefferson Davis Highway
Richmond, Virginia 23234-2257

County-Plant Identification Number: 51- 041-0418

FACILITY DESCRIPTION

NAICS Code: 326112 – Plastics Packaging Materials and Unlaminated Film and Sheet Manufacturing

DuPont Teijin Films™ U.S. Limited Partnership (DTF™) coats plastic film, including Mylar® film, with a variety of coatings. The coating process involves affixing a thin, uniform coating to the surface of the film. The process is organized in the following areas: solution prep, coating and drying, recovery, and bulk storage.

This facility was previously considered to be part of the larger DuPont Spruance Plant (Registration #50397), but when the film portion of the facility was sold to DuPont Teijin Films™, VA DEQ determined that the film facility was no longer under common control with the rest of the Spruance Plant. Therefore, VA DEQ issued the film facility its own registration number (51924) and now considers the film facility to constitute its own stationary source. As specified in the December 7, 2000 letter, DEQ has advised DTF that if DTF undertakes any future projects/modifications of the Mylar Coating operation that would have been subject to major New Source Review (PSD or NAA as may be applicable) had the Mylar coating operation still been considered part of the Spruance plant, DEQ may have to re-evaluate this determination for correctness in order to insure that there would be no inadvertent circumvention of new source review regulations.

The facility is a Title V major source of volatile organic compounds (VOC) and hazardous air pollutants (HAP), specifically toluene. This source is located in an attainment area for all pollutants, and is a PSD minor source. The facility is currently permitted under a Minor NSR Permit issued on February 25, 2000, and amended on February 13, 2001, and June 9, 2011. The Title V renewal application was received on January 28, 2016 (deadline was March 5, 2016) and was deemed timely and complete on January 28, 2016. Therefore, the Title V permit application shield is still in place. The application was deemed technically complete on February 23, 2016.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNITS AND CONTROL DEVICE IDENTIFICATION

Equipment to be operated at this facility consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description*	PCD ID	Pollutant Controlled	Applicable Permit Date
Mylar® Solution Prep Area 3.6 tons/hr coating solution							
MYE01	MYS01-04 Carbon Bed Adsorbers	Z Side Weigh Tanks	---	Carbon Bed Adsorbers	MYS01-04 E, F, G, H	VOC HAP	N/A
MYE02-03	MYS01-04 Carbon Bed Adsorbers	Two (2) Z Side Dissolvers	---	Carbon Bed Adsorbers	MYS01-04 E, F, G, H	VOC HAP	N/A
MYE04-05	MYS01-04 Carbon Bed Adsorbers	Two (2) Z Side Mixer/Blenders	---	Carbon Bed Adsorbers	MYS01-04 E, F, G, H	VOC HAP	N/A
MYE06-09	MYS09-12 Mixing Room Vents	Four (4) Mix Tanks	2,800 gallon capacity each (maximum rated capacity, 3,000 lbs/hr each)	Carbon Bed Adsorbers	MYS01-04 E, F, G, H	VOC HAP	N/A
MYE10-11	MYS01-04 Carbon Bed Adsorbers	Two (2) Dissolver Tanks	---	Carbon Bed Adsorbers	MYS01-04 E, F, G, H	VOC HAP	N/A
MYE12-19	MYS01-04 Carbon Bed Adsorbers	Eight (8) Blenders/Hold Tanks	---	Carbon Bed Adsorbers	MYS01-04 E, F, G, H	VOC HAP	N/A
Coating Areas 3.3 tons/hr coated film product							
Plant 2 - Vertical Coaters							
MYE20-23	MYS01-04 Carbon Bed Adsorbers	Four (4) Vertical Coating Drying Lines	Vertical tower coater “G”: 0.5856 tons/hr coated Mylar® film product	Carbon Bed Adsorbers	MYS01-04 E, F, G, H	VOC HAP	6/9/11 for MYE23

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description*	PCD ID	Pollutant Controlled	Applicable Permit Date
	MYS13-14 Coating Room Vents		Vertical tower coaters "H, I, and J": 1.017 tons/hr (combined) coated Mylar® film product				(Ref. No. CTR-VT G) "G"coater only
Plant 1 - R1 Process Horizontal Multi-Station Coater							
MYE24	MYS05-08 Carbon Bed Adsorbers MYS15 R1 Room Vent/Exhaust Fan	One (1) Three-Station Horizontal Coating / Drying Line	Horizontal multi-station coater: 1.636 tons/hr coated Mylar® film product	Carbon Bed Adsorbers	MYS05-08 A, B, C, D	VOC HAP	6/9/11 (Ref. No. CTR-HMS)
MYE25	MYS16-18 Small Lots Tank Vents (3)	Small Lots Tanks	Each tank <2,000 gallons	Carbon Bed Adsorbers (during fill only)	MYS05-08 A, B, C, D	VOC HAP	N/A
Recovery 1.5 tons/hr THF/toluene							
MYE26	MYS19 Recovery Building Vent/Exhaust Fan	Solvent Recovery Building	1.5 tons/hr THF/toluene	---	---	---	N/A
MYE27	MYS20 Tank Truck Loading Vent	Tank Truck Loading Station	150 gpm pump	---	---	---	N/A
N/A	MYS21 Emergency Vents	Various Emergency Vents	---	---	---	---	N/A
Bulk Storage							
MYT06 (includes	MYS01-04 Carbon Bed Adsorbers	Miscellaneous Storage Tanks	22 tanks Each less than 19,815 gallon capacity with a	Carbon Bed Adsorbers	MYS01-04 E, F, G, H	VOC HAP	N/A

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description*	PCD ID	Pollutant Controlled	Applicable Permit Date
former MYT04 and MYT07)			total capacity of 54,985 gallons. (The capacity of each of the tanks are either below 2,000 gallon capacity or the vapor pressure of the material stored is less than or equal to 1.5 psia.)				
MYT08	MYS01-04 Carbon Bed Adsorbers	One (1) THF Storage Tank	16,500 gallons (Material stored is greater than 1.5 psia.)	Carbon Bed Adsorbers Submerged Fill Pipe	MYS01-04 E, F, G, H	VOC HAP	6/9/11 (Ref. No. TK THF)
MYT09	MYS01-04 Carbon Bed Adsorbers	Secondary containment tank (could contain THF)	4,500 gallons (Material stored is greater than 1.5 psia.)	Carbon Bed Adsorbers	MYS01-04 E, F, G, H	VOC HAP	N/A

*The Size/Rated capacity and PCD efficiency is provided for informational purposes only, and is not an applicable requirement.

EMISSIONS INVENTORY

Emissions are summarized in the following tables.

2016 Actual Emissions

	2016 Criteria Pollutant and Greenhouse Gas Emissions in Tons/Year						
Emissions Unit	VOC	CO	SO_2	PM_{10}	$PM_{2.5}$	NO_X	CO_2e
Facility Wide Total	104.7	-	-	-	-	-	-

2016 Facility Hazardous Air Pollutant Emissions

Pollutant	2016 Hazardous Air Pollutant Emission in Tons/Yr
Toluene	22.7

PROCESS EQUIPMENT REQUIREMENTS – MYE01-27; MYT06, MYT08, and MYT09

There are three sources of specific applicable requirements for the film coating operation: The 5/30/96 VOC RACT Consent Agreement, the 6/9/2011 NSR permit, and 40 CFR 63, Subpart JJJJ requirements. Because of the structure of the VOC RACT Consent Agreement and the NSR permit, except for where noted, the facility's specific applicable requirements apply to the film coating process as whole, as opposed to any specific unit within the operation.

Limitations

- Condition E.13 of the RACT Consent Agreement issued on May 30, 1996 (Condition 1 of the Title V permit) - Film plant VOC emissions shall be controlled by carbon bed adsorbers*. The carbon adsorption system shall be equipped with a device which measures the VOC concentration of the exhaust gas and an exhaust gas flow meter. The instruments shall be calibrated as recommended by the manufacturer for the service in which they are installed. The carbon bed outlet VOC concentration shall not exceed 50 ppm before triggering a switch to a fresh bed.

- Condition E.15 of the RACT Consent Agreement issued on May 30, 1996 (Condition 2 of the Title V permit) - The VOC control efficiency of the film plant processes shall be a minimum of 98.3% on a six-month rolling average basis. This efficiency shall be verified by mass balance methods described or referenced in Condition E.3. of this Agreement.

- Condition 2 of the June 9, 2011 Minor NSR Permit (Condition 3 of the Title V permit) requires control of VOC emissions from the THF storage tank by submerged fill pipe and a four-bed carbon adsorption recovery system capable of achieving at least a 95% control efficiency.

*The above condition also incorporates the applicable requirement (control technology guidelines) from the "Emission Standards for Volatile Organic Compound (VOC) Storage and Transfer Operations (Rule 4-25)". Rule 4-25's emission standard for filling applies to each VOC stationary storage tank with a vapor pressure >1.5 PSIA, a storage capacity >2,000 gallons and located in a VOC control area of which the THF tank meets all three of these applicable requirements. The emission standard for filling requires the tank to be equipped with a control method that will remove, destroy or prevent the discharge into the atmosphere of at least 60% by weight of VOC emissions during the filling of the tank. This standard can be met by the use of a vapor control system such as a submerged fill pipe or any system of equal or greater control efficiency to the submerged fill pipe system provided the system is approved by the board. Monitoring is already in place as indicated in Condition 9 and by the use of material balance to determine the effectiveness of the control technology along with the existing recordkeeping. The secondary containment tank was included in this limitation as it is required to meet the control technology requirement under Rule 4-25 which incorporates this requirement. DuPont Teijin Films – Mylar Plant indicated this tank does not have a submerged fill pipe; however, the plant's VOC emissions are required to be controlled by carbon bed adsorbers under condition E.13 of the 1996 RACT consent agreement.

- Condition 3 of the June 9, 2011 Minor NSR Permit (Condition 4 of the Title V permit) requires control of VOC emissions from the vertical tower "G" coater by a four-bed carbon adsorption recovery system[1].

- Condition 4 of the June 9, 2011 Minor NSR Permit (Condition 5 of the Title V permit) requires control of VOC emissions from the multi-station coater by a four-bed carbon adsorption recovery system[1].

[1]In the prior Title V renewal, it was recommended that when the RACT is next amended the wording be changed to reflect that the carbon bed adsorption recovery systems are an inherent part of the process and are limited by the process limitations.

- Condition 5 of the June 9, 2011 Minor NSR Permit (Condition 6 of the Title V permit) requires a device which continuously measures the VOC concentration of the exhaust gas and which triggers the carbon bed regeneration cycle.

- Condition 6 of the June 9, 2011 Minor NSR Permit (Condition 7 of the Title V permit) limits coated Mylar® film to 28,290 tons per year.

- Condition 7 of the June 9, 2011 Minor NSR Permit (Condition 8 of the Title V permit) limits VOC emissions from the operation of the Mylar® film coating plant to 36.5 lbs/hr and 159.3 tons/year:

Monitoring

The absence of monitoring and recordkeeping requirements in the NSR permit necessitated the following Condition to meet Part 70 requirements.

- (Condition 9 of the Title V permit) requires monthly inspection, records of results, and details of any corrective actions taken of each monitoring device required.

  In a prior Title V renewal, it was determined that the facility does not meet all of the three requirements to be subject to Compliance Assurance Monitoring (CAM), a CAM Plan was/still is not needed along with it being exempt under 40 CFR 64.2(b)(1)(i) as it is subject to a post November 15, 1990 NESHAP of MACT JJJJ (Paper and Other Web Coating). This determination still applies as the Mylar® plant has not been modified since the last Title V renewal. The following is as discussed in a prior Title V renewal Statement of Basis (SOB):

  The carbon adsorption beds and associated recovery system within DuPont Teijin Films™ are not "control devices" but are considered "inherent process equipment" (or "recovery equipment"). Inherent process equipment is defined in 40 CFR 64.1 as, "Equipment that is necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations. For the purposes of this part, inherent process equipment is not considered a control device." To see whether the facility's carbon adsorption beds and associated recovery system were indeed inherent process equipment, specific questions were asked to the facility. These questions came from the Title V Manual, Appendix X – CAM, Attachment B, *Control device or Inherent process equipment determination - Recovery equipment*. The main question is stated below:

  1. What is the value of the material recovered annually compared to the annualized cost of the control equipment (purchase, maintenance, and operation)?

     DuPont – The value of the material recovered annually = $18,500,000
     The annualized cost of the control equipment is as follows:

     Annualized Depreciation = $500,000
     Fixed Costs (Operator/Supervisor/Mechanics pay/Benefits and overtime) = $600,000
     Variable Costs (steam, nitrogen, electric, air, operating replacement parts, carbon, etc.) = $321,000
     TOTAL = $1,421,000 < $18,500,000

     **If the value of the material recovered annually is more than the annualized cost of the equipment, the equipment is not control equipment. This stops all other questions.

  After this first question, it was noted that the equipment is inherent process equipment and is not control devices (see letter dated May 17, 2006 from Wayne Hewitt).

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit.

- Condition E.14 of the May 30, 1996 RACT Consent Agreement and Condition 8 of the June 9, 2011 Minor NSR Permit (Condition 10 of the Title V permit) requires:
  - monthly VOC emissions from the Mylar® film coating plant, calculated by a material balance similar to the method prescribed in 40 CFR §60.603;
  - annual VOC emissions from the Mylar® film coating plant; the number of hours during the calendar month that the Mylar® film coating plant was operating;
  - average hourly VOC emissions from the Mylar® film coating plant;
  - the monthly production of coated Mylar® film and the annual production of coated Mylar® film;
  - maintenance and calibration records for the VOC emission monitoring device;
  - records of the manufacturer's recommendations for carbon bed replacement, and records of actual carbon bed replacement *(RACT)*; and
  - training records.

Testing

The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

However, the permit does require material balance calculations in lieu of specific source tests to demonstrate compliance as explained below:

- Condition E.3 of the May 30, 1996 RACT Consent Agreement and Condition 10 of the June 9, 2011 NSR Permit (Condition 11 of the Title V permit) requires all solvent-spun synthetic fiber processes at each plant shall demonstrate compliance with the VOC control efficiencies as specified in the Agreement by a monthly material balance averaged with the preceding five months. The VOC control efficiencies shall be calculated each month form the VOC emissions determined in the Performance Test and Compliance Provisions section of 40 CFR 60, Subpart HHH (Standards of Performance for Synthetic Fiber Production Facilities 60.600-60.604). The VOC control efficiencies shall be calculated using the following equation:

$$EFF = \left[1 - \left(\frac{E}{1000}\right)\right] \times 100$$

  Where:

  EFF = VOC control efficiency.
  E = Emissions in pounds per 1,000 pounds of solvent feed.

- Condition 10 of the June 9, 2011 Minor NSR Permit (Condition 11 of the Title V permit) requires monthly performance tests by material balance for VOC emissions from the film coating plant to demonstrate compliance with the emission limits.

Reporting

- Condition E.4 of the RACT Consent Agreement issued on May 30, 1996 and Condition 11 of the June 9, 2011 Minor NSR Permit (Condition 12 of the Title V permit) requires a quarterly report (or semiannually if no exceedances) of the results of continuing compliance determinations that indicate that VOC emissions exceed the emission limits.

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR PAPER AND OTHER WEB COATING 40 CFR 63 SUBPART JJJJ – MYE20-24

DuPont Teijin Films™ - Mylar® Plant is subject to Subpart JJJJ since they meet the applicability requirement stated in 40 CFR 63.3290 as being a major source of HAPs (toluene) at which web coating lines are operated. The facility meets the Subpart JJJJ definition of web coating, which states, "Web coating line means any number of working stations, of which one or more applies a continuous layer of coating material across the entire width or any portion of the width of a web substrate, and any associated curing/drying equipment between an unwind or feed station and a rewind or cutting station." Subpart JJJJ requirements apply to the web coating lines and "affiliated operations such as mixing or dissolving of coating ingredients prior to application; coating mixing for viscosity adjustment, color tint or additive blending, or pH adjustment; cleaning of coating lines and coating line parts; handling and storage of coatings and solvent; and conveyance and treatment of wastewater are part of the paper and other web surface coating source category" (see December 4, 2002 Federal Register Preamble). However, MACT Subpart JJJJ does not set emission limits or other requirements for these affiliated operations; therefore, the permit will specify requirements as applying to the web coating lines only.

The following are MACT requirements from 40 CFR 63 Subpart JJJJ:

Emission Standards and Compliance Dates

- 40 CFR 63 Subparts A and JJJJ (Condition 13 of the Title V permit) - The web coating lines shall be operated in accordance with 40 CFR 63 Subparts A and JJJJ.

- 40 CFR 63.3320(b)(1)) (Condition 14 of the Title V permit) - Organic HAP emissions from the web coating lines shall not exceed 5 percent of the organic HAP applied for each month (95 percent reduction).

General Requirements for Compliance with the Emission Standards and for Monitoring and Performance Tests

The permit includes requirements for maintaining records of all monitoring and testing required by 40 CFR 63 Subpart JJJJ.

- 40 CFR 63.3350 (a)(2) and 40 CFR 63.3350 (d)(2)) (Condition 15 of the Title V permit) - For the web coating lines, the permittee must install, calibrate, maintain, and operate according to the manufacturer's specifications a device that indicates the cumulative amount of volatile matter recovered by the solvent recovery device on a monthly basis. The device must be certified by the manufacturer to be accurate to within +/-2.0 percent by mass.

Requirements for Showing Compliance

- 40 CFR 63.3370(i)(1) (Condition 16 of the Title V permit) - For the web coating lines, the permittee shall demonstrate compliance with the emission standard in Condition 14 through a liquid-liquid material balance. The liquid-liquid material balance shall be performed monthly as stated in 40 CFR 63.3370(i)(1) and specified below:

  a. Determine the mass of each coating material applied on the web coating line or group of web coating lines controlled by a common solvent recovery device during the month.

  b. Determine the volatile organic content of each coating material as-applied during the month following the procedure in §63.3360(d).

  c. Determine and monitor the amount of volatile organic matter recovered for the month according to the procedures in §63.3350(d).

  d. Calculate the volatile organic matter collection and recovery efficiency using the following equation:

$$R_v = \frac{M_{vr} + M_{vret}}{\sum_{i-1}^{p} C_{vi} M_i + \sum_{i=1}^{q} C_{vij} M_{ij}} \times 100$$

Where:

Rv = Organic volatile matter collection and recovery efficiency, percent.
Mvr = Mass of volatile matter recovered in a month, kg.
Mvret = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg. The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in §63.3370.
p = Number of different coating materials applied in a month.
Cvi = Volatile organic content of coating material, i, expressed as a mass fraction, kg/kg.
Mi = Mass of as-purchased coating material, i, applied in a month, kg.
q = Number of different materials added to the coating material.
Cvij = Volatile organic content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.
Mij = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

  e. Calculate the organic HAP emitted during the month using the following equation or an equivalent site specific equation, as approved by Piedmont Regional Office:

$$H_e = \left[1 - \frac{R_v}{100}\right]\left[\sum_{i=1}^{p} C_{hi} M_i + \sum_{j=1}^{q} C_{hij} M_{ij} M_{ij} - M_{vret}\right]$$

Where:

H_e = Total monthly organic HAP emitted, kg.

R_v = Organic volatile matter collection and recovery efficiency, percent.
p = Number of different coating materials applied in a month.
C_{hi} = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg.
M_i = Mass of as-purchased coating material, i, applied in a month, kg.
q = Number of different materials added to the coating material.
C_{hij} = Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.
M_{ij} = Mass of material, j, added to as-purchased coating material, i, in a month, kg.
M_{vret} = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg. The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in §63.3370.

After further analysis of §63.3370(i)(1)(vii) Equation 8 which calculates the total organic HAP emitted on a monthly basis, it was determined that this equation, or equivalent site specific equation, is applicable and was added as condition 16e for clarity purposes.

Notifications, Reports, and Records

The permit includes requirements for maintaining records of all monitoring and testing required by 40 CFR 63 Subpart JJJJ.

- 40 CFR 63.3410(b)) (Condition 17 of Title V permit) The permittee shall maintain monthly records of all liquid-liquid material balances performed in accordance with the requirements of Condition 16. The records must be maintained in accordance with the requirements of §63.10(b).

- 40 CFR 63.3400(c)) (Condition 18 of Title V permit) - The permittee shall submit a semiannual compliance report according to 40 CFR 63.3400(c)(1) and (2) to the Piedmont Region. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 and must be postmarked or delivered no later than July 31. This report shall include:
    a. Company name and address.
    b. Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.
    c. Date of report and beginning and ending dates of the reporting period.
    d. If there are no deviations from any emission limitations (emission limit or operating limit) that apply to you, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
    e. For each deviation from an emission limitation (emission limit or operating limit) that applies to you, the compliance report must contain:
        i. The total operating time of each affected source during the reporting period.
        ii. Information of the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.

Upon further analysis of §63.3400 and the provisions pertaining to a startup, shutdown, and malfunction plan (SSMP) in §63.6 (e), SSMP do not apply unless an add-on control system is used to comply with the emission limitations. Subpart JJJJ excludes solvent recovery units (or systems or devices) as an add-on control device. This Title V permit requirement was removed during this renewal.

FACILITY WIDE APPLICABLE REQUIREMENTS

- Condition 14 of the June 9, 2011 Minor NSR Permit (Condition 19 of the Title V permit) requires the facility to:

    - develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance;
    - maintain an inventory of spare parts;
    - have available written operating procedures for equipment; and
    - train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures.

- Condition 9 of the June 9, 2011 Minor NSR Permit (Condition 20 of the Title V permit) requires that the facility be constructed to allow for emissions testing and upon request, provide test ports in appropriate locations.

- (Condition 21 of the Title V permit) requires any testing to be conducted using appropriate method(s) in accordance with procedures approved by the DEQ.

STREAMLINED REQUIREMENTS

The following conditions in the June 9, 2011 NSR permit have not been included for the reasons provided:

- Condition 13 of the 2011 permit has not been included because it is redundant. The Part 70 regulations define specific inspection and entry requirements consistent with the issuance of a Title V permit. These requirements are described in Condition 48 in the General Condition section of the Title V permit and are at least as stringent as the NSR requirements.

- Condition 16 of the 2011 permit has not been included because it is included in the Condition 36 in the General Condition section of the Title V permit and is included as part of the malfunction reporting requirements for the overall permit.

- Condition 12 from the 2011 permit has not been included because the condition defines the causes for suspension or revocation of an NSR permit which are extraneous to the Title V permit. The assumption underlying this determination is that if an NSR permit is revoked or amended through unsolicited action by DEQ, the Title V permit will be changed in a separate and independent action from the NSR change. The Title V permit will change to reflect the changes in applicable requirements brought about by the NSR change.

- Condition 18 of the 2011 permit has not been included because it is redundant. Conditions 51-53 in the General Condition section of the Title V permit describe the requirements for transfer of ownership relative to the Title V permit.

- In a similar manner, conditions 1, 17, and 19 of the 2011 permit all contain general requirements relative to the New Source Review program that are inapplicable or redundant to the Title V permitting program.

INSIGNIFICANT EMISSIONS UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9VAC5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation[1] (9VAC5-80-720A)	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C)
MYE28	Aqueous Based Metal Cleaning Units	9VAC5-80-720 A.38	NA	NA

[1]The citation criteria for insignificant activities are as follows:

9VAC5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9VAC5-80-720 B - Insignificant due to emission levels
9VAC5-80-720 C - Insignificant due to size or production rate

COMPLIANCE PLAN

The facility is not subject to a compliance plan and schedule.

INAPPLICABLE REQUIREMENTS

Citation	Title of Citation	Description of Applicability
NSPS, Subpart VVV	New Source Performance Standards for Polymeric Coating of Substrates	NSPS VVV is not applicable to facilities which coat plastics
MACT, Subpart EEEE	National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)	MACT EEEE is not applicable to storage tanks subject to another Part 63 subpart

Additionally, there are no applicable GHG permitting requirements

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9VAC5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

Federal Enforceability

Article 1 (9VAC5-80-110 N) states that all terms and conditions in the Title V permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.

Permit Expiration

This condition refers to the Board taking action on a permit application. The “Board” refers to the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia,* and the “Department of Environmental Quality Agency Policy Statement No. 2-09”.

This general condition cites the Article that follows:
Article 1 (9VAC5-80-50 et seq.), Part II of 9VAC5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:
9VAC5-80-80. Application
9VAC5-80-140. Permit Shield
9VAC5-80-150. Action on Permit Applications

Failure / Malfunction Reporting

Section 9VAC5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9VAC5-20-180 is from the general regulations. All affected facilities are subject to section 9VAC5-20-180 including Title V facilities. A facility may make a single report that meets the requirements of 9VAC5-20-180. The report must be made within four daytime business hours of discovery of the malfunction.

This general condition cites the sections that follow:
9VAC5-40-41. Emissions Monitoring Procedures for Existing Sources
9VAC5-40-50. Notification, Records and Reporting
9VAC5-50-50. Notification, Records and Reporting

Permit Modification

This general condition cites the sections that follow:
9VAC5-80-50. Applicability, Federal Operating Permit for Stationary Sources
9VAC5-80-190. Changes to Permits
9VAC5-80-260. Enforcement
9VAC5-80-1100. Applicability, Permits For New and Modified Stationary Sources
9VAC5-80-1605. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
9VAC5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follows:
40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.
40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.
40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:
9VAC5-60-70. Designated Emissions Standards
9VAC5-80-110. Permit Content

STATE-ONLY ENFORCEABLE REQUIREMENTS

The following Virginia Administrative Codes have specific requirements only enforceable by the State and have been identified as applicable:

9VAC5-50-310, Odorous Emissions
9VAC5-50-320, Toxic Pollutants

The following limitations, records, testing, and reports are requirements from the State Only Enforceable Conditions of the June 9, 2011 Minor NSR Permit:

- Condition 20 of the June 9, 2011 Minor NSR Permit (Condition 61 of the Title V permit) limits toluene emissions from the operation of the Mylar® film coating plant to 12.5 lbs/hr.

- Condition 21 of the June 9, 2011 Minor NSR Permit (Condition 62 of the Title V permit) requires records of the number of hours during the calendar month that the Mylar® film coating plant was operating; monthly Toluene emissions, calculated by a material balance similar to the method prescribed in 40 CFR §60.603; and average hourly Toluene emissions.

- Condition 22 of the June 9, 2011 Minor NSR Permit (Condition 63 of the Title V permit) requires monthly performance tests by material balance for Toluene emissions from the Mylar® coating plant to demonstrate compliance with the emission limits.

- Condition 23 of the June 9, 2011 Minor NSR Permit (Condition 64 of the Title V permit) requires a quarterly report (or semiannually if no exceedances) of the results of continuing compliance determinations that indicate that Toluene emissions exceed the emission limits.

FUTURE APPLICABLE REQUIREMENTS

No Future Applicable Requirements have been identified for this facility.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit was placed on public notice in the *Style Weekly* on April 12, 2017. All persons on the Title V mailing list were also sent a copy of the public notice via either letter or email dated April 12, 2017. Public comments were accepted from April 12, 2017 through May 12, 2017. No public comments were received.

EPA was notified of the public notice and sent a copy of the Statement of Basis and draft permit on April 12, 2017. The 45-day EPA review ran concurrently with the public comment period and ended on May 29, 2017. On May 4, 2017, comments were received from EPA. All comments were addressed.